

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

THE DUTRA GROUP,

Plaintiff,

v.

NATIONAL LABOR RELATIONS BOARD, a federal administrative agency, WILLIAM B. COWEN, in his official capacity as the Acting General Counsel of the National Labor Relations Board, MARVIN E. KAPLAN, in his official capacity as the Chairman of the National Labor Relations Board, DAVID M. PROUTY, in his official capacity as Board Members of the National Labor Relations Board, JILL H. COFFMAN, in her official capacity as a Regional Director for the National Labor Relations Board, and JOHN DOE in his official capacity as an Administrative Law Judge of the National Labor Relations Board,

Defendants.

Civil Action No. 1:25-cv-00090

**[PROPOSED] ORDER GRANTING PLAINTIFF'S EMERGENCY
MOTION FOR TEMPORARY RESTRAINING ORDER AND/OR
PRELIMINARY INJUNCTION**

WHEREFORE, Plaintiff The Dutra Group, Inc. has moved for a temporary restraining order and preliminary injunction to enjoin Defendants National Labor Relations Board ("Board" or "NLRB"), NLRB Acting General Counsel William B. Cowen ("Cowen"), NLRB Chairman Marvin E. Kaplan ("Kaplan"), Board Member David M. Prouty ("Prouty") (Kaplan and Prouty, collectively, "Board Members"), NLRB Regional Director Jill H. Coffman ("Coffman"), and

Administrative Law Judge John Doe (“Doe”) from conduct causing imminent and irreparable harm.

WHEREAS, the Court, having considered the Motion, any opposition thereto, and argument thereon,

IT IS HEREBY ORDERED, this _____ day of February, 2025, that:

The Motion is GRANTED. Until further order of this Court that all administrative proceedings in National Labor Relations Board Case 20-CA-335452, including without limitation any hearing before an Administrative Law Judge or deposition sought in connection with such hearing, are hereby stayed and enjoined in all respects pending further order of this Court.